

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

DRAFT

Conditional Major, Construction / Operating

Permit: F-08-038

Hosea Project Movers LLC

Covington, KY. 41017

December 15, 2008

Ibrahim AL-Burai, Reviewer

SOURCE ID: 21-117-00185

AGENCY INTEREST: 77337

ACTIVITY: APE20080001

**SOURCE DESCRIPTION:**

Hosea Project Movers LLC assists businesses by moving large pieces of equipment. They are in the business of packing, shipping, rigging, cleaning and painting.

The facility has two paint booths along with associated woodworking and welding activities. The facility also uses two stoves for comfort heat which are fueled by wood scraps from the manufacturing process.

**COMMENTS:**

The VOC potential to emit was calculated to be above the major source threshold. Therefore, the facility requested a VOC emission limit (Conditional Major Permit) to preclude the applicability of Title V. Also, since the facility is located in Kenton County (non- attainment for ozone), the source has opted to take a VOC limit of less than or equal 20 tons per year to preclude the applicability of 401 KAR 59:225 (New Miscellaneous Metal Parts and Product Surface Coating Operations). Potential emission of single HAP and combined HAP's are greater than major source thresholds, but the facility has requested Federally Enforceable Limits on the potential to emit.

**TYPE OF CONTROL AND EFFICIENCY:**

The spray paint booth will utilize "Paint Arrestor filters" with an estimated control efficiency of 90% for particulate matter emissions. Also, a 70% transfer efficiency will be assumed for the spray painting operations.

**EMISSION FACTORS AND THEIR SOURCE:**

AP -42 5<sup>th</sup> edition, and mass balance are used for the emission factors for PM, VOC and HAPS.

## **APPLICABLE REGULATIONS:**

**401 KAR 52:030.** Federally enforceable permits for non-major sources.;

**401 KAR 59:010,** New process operations.

## **PRECLUDED REGULATIONS:**

**40CFR 63 Subpart MMMM-** National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, because the permittee has taken limits on annual individual HAP and combined HAPs emissions avoid triggering major source thresholds. The actual HAP/HAP's emission shall be calculated based on 12-month rolling total.

**40 CFR 63, Subpart HHHHHH,** National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources does apply to this facility since it does not use coatings that contain the target HAP identified in the regulation.

**401 KAR 59:225** Miscellaneous metal parts coating, does not apply because the permittee has taken limit on VOC emissions (less than or equal 20 tons per year) per Section 6 of 401 KAR 59:225. The actual VOC emission shall be calculated based on 12-month rolling total.

## **EMISSION AND OPERATING CAPS DESCRIPTION:**

- a. The source has accepted a facility-wide cap on annual VOC emissions of less than or equal 20.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
- b. The source has accepted a facility-wide cap on annual individual HAP emission of no more than 9.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
- c. The source has accepted a facility-wide cap on annual combined HAPS emissions of no more than 22.5 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
- d. The permittee shall not cause, suffer, allow, or permit any continuous emission into the open air from a control device or stack associated with any affected facility (s) which is equal to or greater than twenty (20) percent opacity.
- e. For emission from a control device or stack, no person shall cause, suffer, allow or permit the emission in to the open air of particulate matter (PM) from any affected facility which in excess of 2.34 lbs/hr.

## **CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.